

REMARKS

Claims 1-16 were examined in the outstanding non-final office action mailed on 02/07/2007 (hereafter "Outstanding Office Action"). All the claims were rejected. By virtue of this amendment, claims 1, 5, 9 and 13 are sought to be amended and new claims 17 and 18 are sought to be added. The amendments and additions are believed not to introduce new subject matter, and their entry is respectfully requested. The amendments and additions are made without prejudice or disclaimer. Claims 1-18 are thus respectfully presented for reconsideration.

Continued Prosecution Application

Applicants thank the Examiner for entering the Applicant's Request for Continued Examination (RCE) submission filed on 14 November, 2006 and for withdrawing the rejections in the Final Office Action Dated 16 August 2006.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-16 were rejected under 35 U.S.C. 102(b) as being anticipated by US Patent Number 6,356,933 issued to Mitchell *et al* (hereafter 'Mitchell'). The rejections are believed to be rendered moot in view of the foregoing amendments, at least for reasons explained below.

Anticipation requires that "each element of the claim at issue is found, either expressly described or under the principles of inherency, in a single prior art reference or that the claimed invention was previously known or embodied in a single prior art device or practice." *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 771 (Fed. Cir. 1983).

Mitchell does not teach several features of currently amended independent claims, and thus does not satisfy the above legal requirement for a proper rejection under 35 U.S.C. § 102 (b).

For example, currently amended independent claim 1 recites "... sending *said search criteria to said second client*; receiving a corresponding response representing *a result of a*

search performed in said first database using said search criteria; ..." (Currently amended independent claim 1, ***Emphasis Added***)

Thus, a first client system sends a search criteria to a second client system and then
5 receives the result of a search performed in the first database using the search criteria.

Mitchell clearly does not disclose or reasonably suggest the use of databases, as well
as search criteria being used to perform a search in the database.

In sharp contrast, even assuming arguendo that the user work station 110 and server
10 computer system 130 are respectively akin to the claimed first client system and the second
client system as appears to be alleged by the Examiner, it is Applicant's position that the
information exchanged between user work station 110 and server computer system 130 does
not include the claimed search criteria or the result of the search performed in the first
database using the search criteria.

15 In support of the position, the Examiner's attention is directed to some example
portions of Mitchell:

Once a dialog is running via the AICP 114, *state changes that occur on either
the control objects (control states) or server components (component state 442, FIG.
2) are packaged and sent between the AICP 114 and AISP 134.* This is a two-way
20 connection and is asynchronous to minimize interactive latency.
(Col 5, lines 59-64 of Mitchell, ***Emphasis Added***)

In use, and referring to FIG. 5, a developer first designs (step 710) the layout
of the user interface 116 that will ultimately be displayed on the user workstation 110
and in so doing establishes the relationships between the control objects 624 (FIG. 4)
25 and the server components 136. *Once this information is formulated, it is stored
(step 712) in a description file 310. When the AICP 114 transmits a request to
execute an application program 420 on the web server 130, the transaction processor
430 (FIG. 2) receives (step 714) the request, instantiates (step 718) an AISP 134
associated with the application program 420 if an instance is not already loaded in
30 memory, and launches (step 720) the application program 420.* Once the AICP 114
receives the description file 310, it transmits a connection request to the AISP 134.
*The AISP 134 receives (step 722) the connection request and loads (step 724) the
description file 310 associated with the requested application program 420 into
server memory.*

35 (Col 6, lines 26-43 of Mitchell, ***Emphasis Added***)

From the above it is believed that the sequence of information exchanges between user workstation 110 and server computer system 130 is as follows:

1. From AICP 114 in user work station 110 to Server computer system 130 to execute an application program;

2. From AISP 134 in Server computer system 130 to AICP 114 in user work station 110: a response containing a description file establishing relationships between the control objects and server components;

3. Bidirectional: State changes.

It is thus concluded that Mitchell does not teach or reasonably suggest a search criteria from user work station 110 to server computer system 130. It is similarly concluded that Mitchell does not teach or reasonably suggest that the results of a search performed in a database are sent back from server computer system 130 to user work station 110.

Furthermore, Applicants draw the Examiner's attention that the invention of claim 1 operates in an environment where "... said first database is designed to be accessed using a second interface implemented in a second client system but not implemented in said first client system, *such that said second client system, but not said first client system, can access said first database...*" (Currently Amended claim 1, *Emphasis Added*).

In sharp contrast, Mitchell teaches that:

An application-independent client process (AICP) reads the description and presents that description to the user as a typical client user interface. Therefore, *the AICP can communicate with an unlimited number of server applications with a new data file description for each program* (which can be cached automatically as required or as specified by the client). No application specific administration is required for executing an AICP-deployed application using this approach.
(Col 2 Lines 42-51 of Mitchell, *Emphasis Added*)

From the above, all user work stations (110) of Mitchell are designed the same way, i.e., to be able to access server computer system (or application components 136 therein) if the corresponding description file is made available to the user work stations.

Accordingly currently amended independent claim 1 is believed to be allowable over the art of record for this additional reason. Independent claim 13 is also believed to be allowable for at least some of similar reasons.

Dependent claims 2-4, and 17, and 14-16, and 18 are allowable at least as depending from respective base claims 1 and 13.

New claim 17 is independently allowable in reciting:

The computer readable medium of claim 1, wherein said *first database is implemented external to said second client system.*
(New claim 17, *Emphasis Added*)

Mitchell does not teach or reasonably suggest such a feature. Mitchell teaches that the AISP 134 ("first interface") and application programs 420 ("first database") are located in the memory of server system 130 ("second client system"). As such, there is no disclosure in Mitchell suggesting that the first database is implemented external to the second client system.

Accordingly, new claim 17 is allowable over the art of record. New claim 18 is also believed to be allowable for at least some of similar reasons.

Currently amended independent claim 5 is allowable over the art of record at least for some of the reasons noted above in reciting:

A computer readable medium carrying one or more sequences of instructions for enabling a new user application to access data in a plurality of databases accessible through a plurality of client systems, wherein each of said plurality of databases is accessible by a corresponding interface which is potentially implemented by only some of said plurality of client systems *such that each of said plurality of client systems is already designed to access data in only some of said plurality of databases*, wherein said new user application and said plurality of client systems are related to operation/control of a manufacturing process in a manufacturing plant, said computer readable medium comprising:

means for *implementing a first plurality of procedures according to a first interface*, wherein said first plurality of procedures are implemented on a second client system contained in said plurality of client systems, wherein said first plurality of procedures enable retrieval of desired data from a first database accessible from said second client system; and

means for access which can be instantiated from said new user application executing on a first client system which cannot access data in said first database, wherein said first client system and said second client system are contained in said plurality of client systems,

wherein said means for access enables *a user to specify said first database and a search query*, wherein said means for access uses said first plurality of procedures implemented in said second client system according to said first interface to *retrieve data matching said query from said first database.*
(Currently amended claim 5, *Emphasis Added*)

Independent claim 9 is also believed to be allowable for at least some of similar reasons.

Dependent claims 6-8 and 10-12 are allowable at least as depending from respective base claims 5 and 9.

Conclusion

Accordingly all the rejections of record are believed to be overcome. The Examiner is invited to telephone the undersigned representative at 707.356.4172 if it is believed that an interview might be useful for any reason.

Respectfully submitted,
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Signature

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